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October 24, 2018

Robert A. Goering, Esq.
220 West Third Street
Suite 399
Cincinnati, OH 45202

Re: In Re: Suzanne Bair
Case No.: 18-12585

Dear Rob:

I have been retained by the Trustee to investigate a potential fraudulent transfer, under Ohio Revised Code Section 1366 et. seq., and to file an adversary complaint, if appropriate, in connection with the above matter.

Specifically, I am looking at the transfer of equity in the property located at 1800 Tanglewood Drive, Loveland, Ohio, from the debtor Suzanne Bair, to her son, David E. Bair, Jr.

I understand that the U.S. Trustee's Office has requested financial information from the Debtor and, at our request, and the U.S. Trustee has indicated his willingness to share the financials. At this point, however, I respectfully request the following documents pertinent to our investigation:

- Personal Federal and State tax returns for the years 2014, 2015 and 2016.
- Business Federal and State tax returns for Bair Build Co., LLC fka Bair Properties, LLC, Bair Investment Group, LLC, and Barestone, LLC, for the tax years 2014, 2015, and 2016.
- Investments held by the Debtor for the period 1/1/15 through 6/1/16 (i.e. including, without limitation, stocks, bonds, pensions, profit sharing plans, IRAs, 401Ks, Mutual Funds, certificates of deposits, etc.)

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- Bank Statements for the years 2015 and 2016 (checking and savings).
- Credit card statements for the period 1/1/16 through 6/1/16.
- Documentation concerning other debt obligations, with outstanding balances, arising from leases, loans, PMSI, installment agreements, and/or personal guarantees, for the period 1/1/15 through 6/1/16.
- Whole life insurance policies covering the period 1/1/15 through 6/1/16.
- Personal Property/Homeowners insurance policies, with Riders, covering the period 1/1/15 through 6/1/16.
- Mortgage closing statement in connection with the transfer of 1800 Tanglewood Drive, Loveland.
- Any settlement statement(s)/accounting of outstanding balances due on Lease Agreement, and/or security deposit reconciliation received from Lavonne Hubers, in connection with the transfer of 1800 Tanglewood Drive, Loveland, to David E. Bair, Jr.

Your courtesy in providing the foregoing, within the next 30 days, would be greatly appreciated. If the documents are not forthcoming, I have been instructed to file a complaint and obtain the documents through discovery. I am looking forward to your cooperation and hoping that this matter can be resolved amicably.

Very truly yours,

Christine B. Hill

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CBH: tk